

REMARKS

The Examiner continues to reject the claims as either being anticipated by Gupta alone, or as being obvious over Gupta in view of some other reference(s). Applicant has amended the claims to clarify what is considered to be the invention. It is respectfully submitted that, as the claims are amended, the Gupta reference is not applicable.

In particular, Gupta discloses (at the portions cited by the Examiner), a mechanism for "packing" communication between a single HTTP client and a web server. For example, see the Abstract, where it is stated that a proxy layer resides on a mobile client station. The proxy layer on the mobile client station captures HTTP requests and packs the HTTP requests for upstream transmission. At the server, the HTTP request messages are recovered and are then sent to an appropriate web server for further processing. Responsive HTTP messages are packed for transmission to the mobile client station, and the proxy layer on the mobile client station recovers the HTTP responses, which are then sent to the web browser for processing. As a result, Gupta explains, packed messages are sent in a bandwidth efficient manner over the wireless network. See, for example, col. 4, lines 25-40.

Applicant does not disagree that Gupta discloses network caching. However, Gupta does not disclose or suggest accelerating network caching. Taking Applicant's claim 1 as an example, network cache acceleration is achieved in a web server by, for multiple HTTP requests (i.e., received from multiple HTTP clients), sending the multiple HTTP requests in a single stream from a network cache accelerator of the web server to a file system of the web server

Gupta does not disclose HTTP requests are received from a plurality of HTTP client applications, wherein the HTTP request data and associated connection identifiers are sent in a stream from a network cache accelerator of the web server to a file system of the web server. Put another way, Gupta does not disclose that a "stream" *between a network cache accelerator of the web server and a file system of the web server* corresponds to HTTP requests received from a plurality of HTTP clients. In fact, Gupta does not commingle HTTP requests from different HTTP clients.

The Examiner, in the section entitled "Response to Arguments," states that "Gupta discloses HTTP requests received from a plurality of HTTP client applications. . . . Applicant agrees with this statement, but this statement does not, in fact, address the full extent of Applicant's arguments. In fact, by taking only a small portion of Applicant's argument, out of context, the Examiner has failed to fully address Applicant's arguments.

If the Examiner continues to reject the claims based on Gupta, then Applicant respectfully requests the Examiner to point out the particular elements of Gupta that are considered to be the network cache accelerator of a web server and the file system of the web server. Applicant further respectfully requests the Examiner to point out the particular disclosure in Gupta of HTTP requests received from a plurality of HTTP client

applications, wherein the HTTP request data and associated connection identifiers are sent in a stream from the network cache accelerator of a web server to a file system of the web server.

Applicant agrees that memory caches in web servers are known. Gupta discloses one example of a memory cache in a web server. However, as discussed above, the subject matter of Applicant's claims are directed to, in part, the use of a network cache accelerator. The network cache accelerator operates such that, for example, a new stream need not be created for each new HTTP request received. See, e.g., page 11, lines 11 to page 12, line 24, of Applicant's specification.

Turning now to the Examiner's characterization of Applicant's arguments, what Applicant actually argued is that "Gupta does not disclose HTTP requests are received from a plurality of HTTP client applications, *wherein the HTTP request data and associated connection identifiers are sent in a stream from a network cache accelerator of the web server to a file system of the web server.*" The Examiner appears to have not considered the portion of the argument set forth in the previous sentence in *bold italic*. In apparent "Response" to Applicant's arguments, the Examiner specifically cites to Gupta at col. 6, lines 52-62 and to col. 7, line 66 to column 8, line 10. It is instructive to look at the exact language contained in these cited sections of Gupta:

Col. 6, lines 52-62

In this regard, information contained in downstream HTTP messages received from a respective web server 44 is also duplicated for storage in the server memory cache 48, or otherwise used to update previously stored information. As information requests are received from any of the client stations 28 in the system 20, the web agent 42 first determines whether the requested information is already present in the server memory cache 48. If so, the information is retrieved from the memory cache 48 by the web agent 42, and transmitted to the respective client station 28, without requiring further processing.

Col. 7, line 66 to Col. 8, line 10

For example, while particularly useful for mobile-based client-server systems employing a relatively low speed, high latency wireless network to establish communication links between the server and respective client stations, the advantages of improving efficiency over the client-server communication link and in eliminating the need for specialized APIs as provided by the inventive concepts disclosed and described herein may be obtained in client-server systems using any type of network architecture—e.g., telephonic dial-up or even a high speed LAN connection--wherein raw HTTP message transmission is not possible or is otherwise impractical.

In the first place, neither of these portions of Gupta even disclose transmission of any data -- HTTP request data and associated connection identifiers or otherwise -- from a network cache

accelerator of the web server to a file system of the web server. Thus, for at least this reason, the Gupta disclosure is not sufficient to anticipate the subject matter of claim 1.

In addition, claim 1 recites "sending the connection identifier and the associated HTTP request data for the HTTP requests from the HTTP clients in a first stream." Gupta discloses receiving information requests from multiple client servers and, when the requested information is already present in the server memory cache, retrieving the requested information from the server memory cache and transmitting the information to the respective client without further processing. Gupta does not disclose sending information in a stream let alone, as discussed above, in a stream from a network cache accelerator of the web server to a file system of the web server. Thus, for at least this reason, too, the Gupta disclosure is not sufficient to anticipate or suggest the subject matter of the claim 1.

The discussion above is similarly applicable to the other independent claims and, thus, is incorporated herein by reference in response to the anticipation rejection of those claims.

Kawabe is relied upon by the Examiner only for its alleged disclosure of a file descriptor and a private attachment. The allegations with respect to Kawabe do not cure or otherwise address the deficiencies in Gupta. It is thus respectfully submitted that an obviousness rejection of the independent claims, using a combination of Gupta and Kawabe (assuming for the sake of argument only that there would be some suggestion or motivation to make that combination) would be likewise insufficient.

CONCLUSION

For the aforementioned reasons, it is respectfully submitted that Gupta (whether alone or in combination with Kawabe) does not support a prima facie case of anticipation or obviousness of the presently-pending claims. Applicant thus respectfully requests that the rejections be withdrawn.

Applicant further respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that an additional telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,
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